



Environmental
Protection Agency

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director



1PV0010220101124

CLERMONT TALL TIMBERS MHP

JACKSON, JOSHUA 2010/11/24



**Environmental
Protection Agency**

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Lee Fisher, Lt. Governor
Chris Korfaski, Director

November 29, 2010

Tall Timbers Mobile Home Park
Attn: Mr. James Moore
2780 Lindale-Mt. Holly Road
Amelia, OH 45102

**RE: Tall Timbers MHP WWTW/Compliance Evaluation Inspection
NPDES Permit No. OH0123323/OEPA PERMIT NO. 1PV00102*BD**

Dear Mr. Moore:

On November 17, 2010, I conducted an NPDES Compliance Evaluation Inspection at the Tall Timbers Mobile Home Park wastewater treatment works (WWTW). Mr. Rick Hopper and Mr. James Hopper were present during the inspection. A follow-up telephone conversation with Mr. Bob Reckers (Winelco, Inc.), who is the Operator-of-Record for this facility was made after the inspection. The purpose of the inspection was to evaluate compliance with the terms and conditions of the NPDES permit.

In general, the Tall Timber MHP WWTW was in good condition, had no objectionable odors and the effluent was clear. Please note, however, that there are **"Items for Correction"** for both the owner and the Operator-of-Record within the report (in bold type). Please pay special attention to these items for there are compliance schedules associated with them.

Thank you and your staff for the time extended during the inspection process. If you have any questions, please feel free to contact me by phone at (937) 285-6029 or by e-mail at joshua.jackson@epa.state.oh.us.

Respectfully,

Joshua Jackson
Environmental Specialist II
Division of Surface Water

Cc: Rick Hopper, Tall Timbers MHP (with report)
Bob Reckers, Winelco, Inc. (with report)
Michael Ullman, Winelco, Inc. (with report)

Enclosure

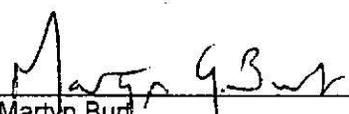


State of Ohio Environmental Protection Agency
Southwest District Office

NPDES Compliance Inspection Report
Semi-Public Sewage Disposal Inspection Form

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1PV00102*BD	OH0123323	11/17/2010	C	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Tall Timber MHP 2780 Lindale-Mt. Holly Road Monroe Township, Clermont County	10:00 a.m.	8/1/2006
	Exit Time	Permit Expiration Date
	10:45 a.m.	7/31/2011
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Rick Hopper, Park Manager James Hopper, Maintenance	513-797-4068 513-722-6168	
Name(s), Address and Title(s) of Operator of Record	Phone Number(s)	
Bob Reckers, Winelco, Inc.	513-755-8050	
Name, Address and Title of Responsible Official	Phone Number	
James Moore Moore Enterprises 2780 Lindale-Mt. Holly Road Amelia, OH 45102	513-797-4068	

Ohio EPA Inspector	Ohio EPA Reviewer
 Joshua Jackson Division of Surface Water Southwest District Office	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
11-24-10 Date	11/24/10 Date

Permit # : 1PV00102*BD
 NPDES #: OH0123323

Average Daily Design Flow:	53,000 Gallons/Day
Plant Serves:	176 total mobile home lots (120 are currently occupied)
Average Daily Flow: (Period of Review):	26,000 Gallons/Day (January - September 2010)
Method of flow monitoring:	Elapsed time meters (sand filter dosing pumps)
Type of alarms for plant:	high level alarm for sand filter dosing wet well and equalization basin

Pretreatment

Type of Pretreatment: Trash Trap
 Does the Trash Trap need pumped: Yes
 Maintenance of pretreatment components is: Fair

Comments/Status:

**Secondary Treatment
 (Aeration)**

Color of sludge: Medium Brown
 Quality of Sludge: Medium
 Foam: Medium, Brown Foam
 Odor: No objectionable odor present

	Yes	No		Yes	No
Aeration is taking place	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Plant is septic	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Blowers are operating	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Blowers are on a timer	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Skimmers are operating	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Plant is flooded	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Diffusers are operating	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Grating is present	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sludge return is operating	<input checked="" type="checkbox"/>	<input type="checkbox"/>			

Maintenance of aerating equipment is...Good

Comments/Status:

**Secondary Treatment
 (Settling)**

Clarity: Solids Present

Permit #: 1PV00102*BD
NPDES #: OH0123323

Condition of Weir: **Clean**
Weir is level: **Yes**
Effluent in weir: **Very Light Solids**
Clarifier walls need scraped: **No**

Overall maintenance of settling components is: **Good**

Comments/Status:

Spoke to operator of small floc in the clarifiers. He believes that it was due to excessive rainfall the prior day. Apparently the collection system has inflow and infiltration issues (although the EQ basin buffers to some extent)

Tertiary Treatment

	Yes	No		Yes	No
Surface sand Filters: Slow	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Subsurface	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Distribution box operating	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Beds alternated	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Are filters ponding/flooding	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Beds raked	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sand filters overgrown	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Chlorination present	<input type="checkbox"/>	<input checked="" type="checkbox"/>
UV present	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Dechlorination present	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Overall maintenance of components is: **Good**

Comments/Status:

Spent sand was stacked up around the outside of the filter walls. UV system was still operating even though it is non-recreation season.

Sludge Handling/Storage Disposal

Hauler name: **Winelco, Inc.**
Sludge last wasted from sludge holding tank on November 12, 2010.
Sludge drying beds: **Yes** Sludge holding tank: **Yes**

Overall maintenance of components is: **Excellent**

Plant Discharge

Discharge point is a: **Stream**
Name of discharge point: **Briggs Run**
Discharge is visible: **Yes** Quality of Effluent: **Clear**

Comments/Status:

Discharge and stream was free from solids attributed to the Tall Timbers MHP WWTW.

Inspection Findings

The Tall Timbers Mobile Home Park (MHP) wastewater treatment works (WWTW) is designed to treat and discharge 53,000 gallons/day to Briggs Run. A review of the discharge monitoring reports from the months of January-September 2010 shows that the WWTW is receiving around 26,000 gallons/day. Tall Timbers reported one numeric effluent violation during that same period of time, as shown below:

EFFLUENT LIMIT VIOLATIONS (Period of Review: January – September 2010)

7D = Weekly 30D = Monthly 1D = Daily Conc. = Concentration (mg/l) Qty. = Quantity (Kg/Day)

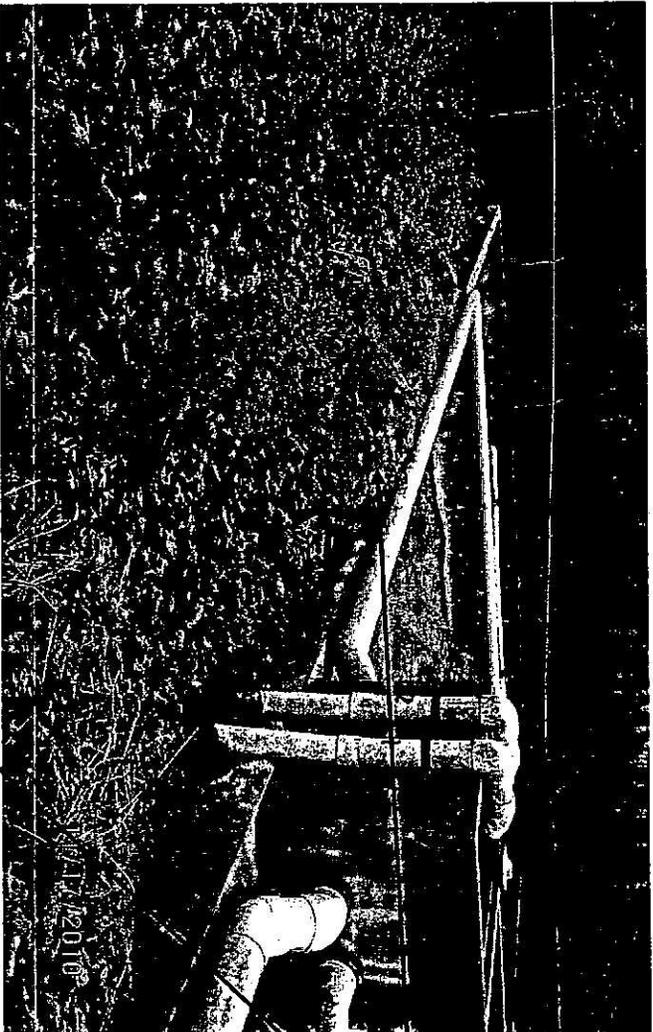
<u>Month Reported</u>	<u>Parameter</u>	<u>Frequency / Units</u>	<u>Limit</u>	<u>Value</u>
June 2010	Dissolved Oxygen	1D Conc	6.0	5.

Items Noted During the Inspection

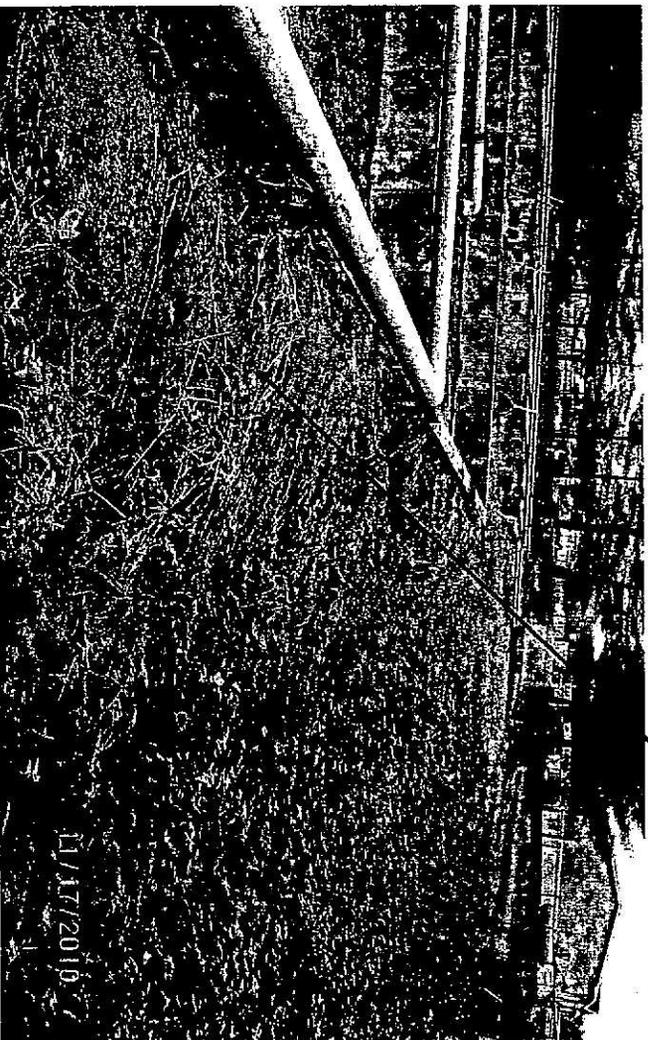
- Mr. James Hopper (park maintenance) had collected leaves out of the WWTW. The WWTW is surrounded by trees outside of the fence and the autumn leaf fall clogs up the skimmer and sludge return lines.
- One side of the extended aeration system had brown foam that covered around 1/6 of the aeration tank and 1/6 of the clarifier. Apparently there was a blocked sludge return line in the recent past and excessive rainfall the day prior to the inspection. Large quantities of small floc particles were prevalent throughout both clarifiers.



- All sides of the slow surface sand filters contained spent sand that had been cleaned out of the beds. James Hopper stated that they had purchased heavy equipment to move the sand to the landfill roll-off box. It is expected that all of this material will be removed and properly disposed of by no later than January 1, 2011.



Spent sand



- The ultraviolet bulbs, utilized for disinfection, were still on even though it is not recreation season. In a follow-up with Mr. Bob Reckers (Winelco, Inc.), he stated that they will run the UV system all year long and then replace the UV bulbs prior to the start of every recreation season.
- The effluent from the UV disinfection system was clear.

Operator of Record Logbook

Ohio Administrative Code 3745-7-09(A)(1) and (2) state the following:

(A) The owner and operator of record of a public water system, treatment works or sewerage system shall maintain or cause to be maintained operation and maintenance records for each public water system, water treatment plant within a public water system, treatment works, or wastewater treatment facility within a treatment works. Some of the formats in which the records may be maintained include, but are not limited to, hard bound books with consecutive page numbering, time cards, separate operation and maintenance records, or well organized computer logs.

(1) The records shall be housed and maintained in such a manner as to be protected from weather damage and guarantee the authenticity and accuracy of the records contained within.

(2) The records shall be accessible onsite for twenty-four hour inspection by agency or emergency response personnel.

At the time of the inspection there was no Operator of Record Logbook on-site that met the criteria stated in the rule above. Winelco does provide copies of the service reports, which contain much of the information required by the rule, to the permittee. However, in order to guarantee "authenticity" of the daily entries, the logbook must be kept in the form of a hard bound book with consecutive page numbering or a well-organized computer log (password protected). The logbook must be kept on-site and protected from weather damage. **It is expected that Winelco, Inc. will begin maintaining the appropriate logbook for this facility and all other clientele that have WWTWs. This should be done without delay but no later than December 31, 2010.**

Thermometer

The thermometer used by maintenance staff to record the final WWTW effluent is graduated in 1-degree increments. **At a minimum, thermometers with 0.1-degree increments must be utilized. Please make this change by no later than December 15, 2010.**

There must also be documentation that the thermometer has been calibrated (at least annually) with an National Institute of Standards & Technology (NIST)-traceable thermometer. This documentation needs to be located on-site and available for review.